

Douglas R. Ricks, OSB #044026
VANDEN BOS & CHAPMAN, LLP
319 SW Washington St., Ste. 520
Portland, OR 97204
Telephone: 503-241-4869
Fax: 503-241-3731

Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Blue Moon Property Group, LLC

Debtor-in-Possession.

Case No. 22-31873-thp11

DECLARATION OF RONNIE SAPP RE:
CLAIM OF BRILLIANT HOMES LLC

I, Ronnie Sapp, declare and state as follows:

1. I am one of the members of Brilliant Homes LLC and am aware of the facts and circumstances regarding the financial and business relationship between Debtor-in-Possession, Blue Moon Property Group, LLC ("Debtor") and Brilliant Homes LLC.

2. Brilliant Homes LLC is the sole member of Debtor with a 100% ownership interest. I have a 90% ownership interest in Brilliant Homes LLC.

3. The Debtor is the owner of the real estate at 3220 Southshore Blvd, Lake Oswego, OR 97034 (the "Property") and Brilliant Homes LLC funded the repairs and renovations to the Property. Brilliant Homes LLC is listed as an unsecured creditor on Debtor's Schedule F of its bankruptcy filing and is a member of the Class of Equity Interest Holders of Debtor's Plan.

4. Brilliant Homes LLC has been advised to seek counsel in connection with its claim against the Debtor and in connection with this Declaration.

5. In connection with such claim, Brilliant Homes LLC consents to the following: (a) distributions under Debtor's Plan made to Classes 1 – 3 of Debtor's Plan, fund the Reserve for the benefit of the Lake Oswego Corporation, and pay, or to reserve funds sufficient to pay, Administrative Expense claims, (b) that the other Class 4 creditor, Lake Oswego Corporation, will receive different treatment on its claim, including payment in full from the Reserve, and (c) Brilliant Homes, LLC will only receive, on account of its claim, such amounts that are available after payments to Classes 1 – 3 of Debtor's Plan, the Lake Oswego Corporation, and Administrative Expense claims, as such Administrative Expense claims may be approved by the Court and subject to any amounts and payment terms agreed with such Administrative Expense claimants.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand the above statements are made for use as evidence in Court and are subject to penalty for perjury.

Dated: April 21, 2023

/s/ Ronnie Sapp
Ronnie Sapp, Declarant

CERTIFICATE - TRUE COPY

DATE: April 21, 2023

DOCUMENT: DECLARATION OF RONNIE SAPP RE: CLAIM OF BRILLIANT
HOMES LLC

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

Blue Moon Property Group, LLC
Attn: Ronald Sapp
17600 Pacific Hwy Unit 338
Marylhurst, OR 97036

by mailing a copy of the above-named document to each of the above in a sealed envelope addressed to the last known address. Each envelope was deposited into the postal system at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: April 21, 2023

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #073501
Of Attorneys for Debtor-in-Possession